

PRESENTMENT DATE AND TIME: May 29, 2012 at 12:00 noon (Eastern Time)
OBJECTION DEADLINE: May 29, 2012 at 11:30 a.m. (Eastern Time)

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for General Motors LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

Chapter 11 Case No.
09-50026 (REG)
(Jointly Administered)

**NOTICE OF SETTLEMENT OF ORDER FURTHER SUPPLEMENTING ORDER
ENFORCING 363 SALE ORDER WITH RESPECT TO PRODUCTS LIABILITY
CLAIM AND DISCOVERY REQUESTS OF DR. TERRIE SIZEMORE**

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York, the proposed Order Further Supplementing Order Enforcing 363 Sale Order with Respect to Products Liability Claims and Discovery Requests of Dr. Terrie Sizemore, a copy of which is annexed hereto, will be presented for settlement and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, at Room 621 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (the “Court”) on **May 29, 2012 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections or proposed counterorders

must be made in writing and received by the Court and the undersigned not later than **May 29, 2012 at 11:30 a.m. (Eastern Time)**. Unless an objection or proposed counterorder is received by that time, the proposed order annexed hereto may be entered by the Court.

Dated: New York, New York
May 22, 2012

/s/ Stephen Karotkin

Harvey R. Miller

Stephen Karotkin

Joseph H. Smolinsky

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New York, New York 10153

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f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
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**ORDER FURTHER SUPPLEMENTING ORDER
ENFORCING 363 SALE ORDER WITH RESPECT TO PRODUCTS LIABILITY
CLAIMS AND DISCOVERY REQUESTS OF DR. TERRIE SIZEMORE**

Upon the (i) Motion for Entry of Order Pursuant to 11 U.S.C. § 105 Enforcing 363 Sale Order and ARMSPA Ordering New GM to Comply with Terms and Provisions, dated August 12, 2011 (the “**Motion to Enforce**”) and (ii) Motion for Sanctions, dated August 12, 2011 (the “**Motion for Sanctions**,” and together with the Motion to Enforce, the “**Sizemore Motions**”) each filed by Dr. Terrie Sizemore (“**Dr. Sizemore**”), in connection with all products liability claims and discovery requests of Dr. Sizemore (collectively, the “**Sizemore Actions**”); and upon the Response of General Motors LLC (“**New GM**”) to the Sizemore Motions, dated September 28, 2011 (ECF No. 10995); and a hearing having been held on April 26, 2012 to consider the relief requested in the Sizemore Motions (the “**Hearing**”); and upon the record of the Hearing and the Court’s decision with respect to the Sizemore Motions as stated on the record of the Hearing; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Sizemore Motions are each denied, with prejudice; and it is further

ORDERED that Dr. Sizemore shall immediately dismiss (i) New GM and all of its agents and affiliates (collectively, the “**New GM Entities**”) and (ii) Motors Liquidation Company (f/k/a General Motors Corporation) (“**MLC**”) and all of its agents and affiliates (collectively, the “**MLC Entities**”), from the Sizemore Actions, with prejudice, and provide written evidence to this Court of such dismissal within fourteen (14) days of the date of this Order; and it is further

ORDERED that Dr. Sizemore be and hereby is permanently enjoined and estopped from any further prosecution of the Sizemore Actions (**including any discovery**) as against (i) the New GM Entities and (ii) the MLC Entities or from otherwise pursuing any of the claims asserted or which could be asserted in the Sizemore Actions against (i) the New GM Entities and (ii) the MLC Entities, in any other action, forum, proceeding, or otherwise; and it is further

ORDERED that, unless within fourteen (14) days from the date hereof, Dr. Sizemore files an objection to this decretal paragraph, pursuant to Rule 9014 of the Federal Rules of Bankruptcy Procedures, Rule 70 of the Federal Rules of Civil Procedure will, without further Order of the Court, be applicable to this matter. In such event, should Dr. Sizemore fail to comply with this Order, New GM is hereby appointed by this Court to act on Dr. Sizemore’s behalf to carryout the provisions of this Order, and Dr. Sizemore shall promptly reimburse New GM for all costs and expenses incurred in connection therewith upon presentation of an invoice for the same; and it is further

ORDERED that, for the avoidance of doubt, this Order shall not be collaterally attacked in any other court, State or Federal, and it shall be reviewed only by a higher court in the Second Circuit; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Dated: New York, New York
May __, 2012

United States Bankruptcy Judge